



State of California  
**Respiratory Care Board**  
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**Inquiry:** My question is whether my company needs to have a Medical Director supervising our respiratory therapists, even if the therapists perform equipment maintenance and not clinical services.

**Response:** Please be advised that the Respiratory Care Practice Act (RCPA) requires that a licensed respiratory care practitioner (RCP) must perform respiratory care, as defined in Section 3702, under the direction of a medical director.

Your letter also inquires whether a medical director is necessary when a licensed RCP is performing "equipment maintenance." To the Board's knowledge, this function does not require any type of license, much less an RCP license. However, you should be cautioned that any application by an RCP of a device for the purposes of treatment, diagnosis, and/or rehabilitation of cardiopulmonary dysfunction may be construed as the practice of respiratory and, as such, would require a medical director.

Reference # 2000-C-13